

## REMARKS

Claims 1-10 are pending in the application. Claims 1, 2 and 4-10 have been amended. Reconsideration of this application is respectfully requested.

The Office Action has objected to the drawing because Figs. 1 and 2 need to be labeled as "Prior Art". The drawing has been amended subject to the approval of the Examiner by the placement of Prior Art labels on Figs. 1 and 2. Therefore, it is submitted that the objection to the drawing is obviated.

The Office Action rejects claim 10 under 35 U.S.C. 101 as being directed to non-statutory subject matter. The Examiner suggests that the rejection will be overcome if the preamble is amended to read: "A computer readable medium encoded with computer executable instructions for controlling the processing of a system that decodes a coded data stream, said set of computer executable instructions performing". Claim 10 has been so amended, except that "performing" is replaced by "comprising the steps of". Accordingly, it is submitted that the rejection of claim 10 under 35 U.S.C. 101 is obviated by the amendment.

Claims 1, 2 and 4-9 have been amended and claim 10 has been further amended to cure various antecedent issues.

The Office Action rejects claim 2 under 35 U.S.C. 102(b) as anticipated by U.S. Patent No. 6,310,921 to Yoshioka et al., hereafter Yoshioka.

This rejection is erroneous. Claim 2 recites a power aware decompression method that involves a decompression procedure that uses a secondary memory for storage of data frames and prediction data and a primary memory that stores prediction data. Claim 2 recites the generation of a first selection signal that signals whether the data to be used for a prediction process resides in the primary memory in whole or in part. Claim 2 further recites the

generation of a second signal based on an estimate of future needs of the prediction process to signal that portion of the primary memory where the prediction data, which is not already present in said primary memory should reside. The needed prediction data is then transferred from the secondary memory to the primary memory. Yoshioka discloses a secondary memory 3, but does not disclose the claimed primary memory and first and second signals. The Examiner contends that the first and second signals are disclosed by Yoshioka, citing Figs. 4-6, column 11, lines 13-28, column 12, lines 1-21, and column 13, line 53 to column 14, line 9. These citations do not describe any signals. Fig. 4 shows a FIFO memory 4 that is a buffer for the current video block and an internal memory 8 that is not disclosed as holding any predictive data for processor 7. In fact, predictive data is held only in external memory 3 and requested on demand by pixel read/write unit 11 as described in column 18. Therefore, Yoshioka lacks the primary memory and the first and second signals and does not anticipate claim 2.

For the reason set forth above, it is submitted that the rejection of claim 2 under 35 U.S.C. 102(b) as anticipated by Yoshioka is erroneous and should be withdrawn.

The Office Action rejects claims 1, 3-7 and 10 under 35 U.S.C 103(a) as unpatentable over U.S. Patent No. 5,675,387 to Hoogenboom et al., hereafter Hoogenboom in view of Yoshioka.

This rejection is erroneous. With respect to claim 1, which recites an encoding method, Hoogenboom discloses only a decoding method and not an encoding method. Therefore, the combination of Hoogenboom and Yoshioka does not disclose the encoding method claimed by claim 1.

With respect to claim 3, the Examiner admits that Hoogenboom does not disclose a primary memory, but contends that Yoshioka does. This contention is

mistaken. As noted above in the discussion of claim 2, Yoshioka does not disclose a primary memory. Therefore, the combination of the combination of Hoogenboom and Yoshioka does not disclose the encoding method claimed by claim 3.

With respect to independent claim 4, the claimed combination of the primary memory and the secondary (external) memory is not disclosed by Yoshioka as discussed above.

Moreover, neither Hoogenboom nor Yoshioka discloses the claimed memory management scheme. Hoogenboom's memory management scheme reduces the number of memory accesses to the external memory by storing the data of a video block in a single row and consecutive blocks in consecutive rows. Since neither Hoogenboom nor Yoshioka discloses a primary memory, there is no disclosure of the claimed memory management scheme "by a connection arrangement for transmission from the processor to the external and internal memories" as recited in independent claim 4.

With respect to independent claim 7, the claimed combination of the primary memory and the secondary (external) memory is not disclosed by Yoshioka as discussed above. Moreover, neither Hoogenboom nor Yoshioka discloses a primary memory that is dedicated to a motion compensation function of decoding as recited in independent claim 7.

With respect to independent claim 10, the claimed combination of the primary memory and the secondary (external) memory is not disclosed by Yoshioka as discussed above.

For the reasons set forth above, it is submitted that the rejection of claims 1, 3-7 and 10 under 35 U.S.C. 103(a) is erroneous and should be withdrawn.

The Office Action rejects claims 8 and 9 under 35 U.S.C 103(a) as unpatentable over U.S. Patent No. 5,576,767 to Lee et al., hereafter Lee, in view of Yoshioka.

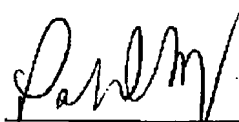
This rejection is erroneous. The Examiner admits that Lee does not disclose a primary memory model coupled to a motion estimator, but contends that Yoshioka does. However, Yoshioka does not disclose a primary memory as discussed above. Therefore, Yoshioka does not disclose a primary memory model coupled to a motion estimator as claimed in independent claim 8.

For the reason set forth above, it is submitted that the rejection of claims 8 and 9 and under 35 U.S.C. 103(a) is erroneous and should be withdrawn.

It is respectfully requested for the reasons set forth above that the objection to the drawing be withdrawn, that the rejections under 35 U.S.C. 101, 35 U.S.C. 102(b) and 35 U.S.C. 103(a) be withdrawn, that claims 1-10 be allowed and that this application be passed to issue.

Respectfully Submitted,

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## **APPENDIX 1**

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